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January 16, 2025

**Via: ECF**

Magistrate Judge Miroslav Lovric  
Northern District of New York  
Federal Building and U.S. Courthouse  
15 Henry Street  
Binghamton, New York 13901

**Re: Shara v. Binghamton Precast & Supply Corp. et al., 3:23-cv-135**  
**Status Report**

Dear Judge Lovric:

The parties submit this joint status report pursuant to your most recent text order. The parties mutually request a brief, off the record, phone call or video conference to discuss the discovery timeline and the extenuating circumstances we believe exist to justify an additional extension of the discovery timeline. The parties continue to work collaboratively in completing discovery but have been unable to complete discovery to date.

Very truly yours,  
COUGHLIN & GERHART, LLP

By   
Angelo D. Catalano

cc: Adam Sackowitz, Esq., Via ECF